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6 Attorneys for Defendants County of
Siskiyou; Jeremiah LaRue and Jesus
Fernandez, in their official capacities
7 as members of the Siskiyou County
Sheriff's Department and in their individual
8 capacities; Brandon Criss, Ed Valenzuela,
Michael N. Kobseff, Nancy Ogren, and
9 Ray A. Haupt, in their official capacities
as members of the Siskiyou County Board
10 of Supervisors and in their individual
capacities; Edward Kiernan, in his official
11 capacity as County Counsel for Siskiyou
County and in his individual capacity;
12 and DOES 1-100.

13 UNITED STATES DISTRICT COURT

14 EASTERN DISTRICT OF CALIFORNIA

15 SACRAMENTO DIVISION

16 Dilevon Lo, Jerry Vang, Nathan Thao, Mao
Thao, Pao Lee, Antonio Lee, Koua Lee, Nhia
17 Thai Vang, Zeng Lee, Der Lee and Khue Cha

18 Plaintiffs,

19 vs.

20 County of Siskiyou; Jeremiah LaRue and
Jesus Fernandez, in their official capacities as
members of the Siskiyou County Sheriff's
21 Department and in their individual capacities;
and Brandon Criss, Ed Valenzuela, Michael
22 N. Kobseff, Nancy Ogren, and Ray A. Haupt,
in their official capacities as members of the
23 Siskiyou County Board of Supervisors and in
their individual capacities; Edward Kiernan,
24 in his official capacity as County Counsel for
Siskiyou County and in his individual
25 capacity; and DOES 1-100,

26 Defendants.
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Case No.: 2:21-cv-00999-KJM-DMC

**DEFENDANTS' AMENDED
OBJECTIONS TO THE AFFIDAVIT OF
NHIA THAI VANG DATED JUNE 11,
2021 (CM/ECF NO. 9-5)**

Complaint Filed: June 4, 2021

First Amended Complaint Filed: July 15, 2021

Date: August 6, 2021

Time: 10:00 AM

**[FEES EXEMPT PURSUANT TO
GOVERNMENT CODE SECTION 6103]**

Defendants hereby submit their objections to the affidavit filed by Nhia Thai Vang in support of Plaintiffs' original motion for TRO and preliminary injunction and the current motion for preliminary injunction.

Material Objected To:	Grounds for Objection:	Ruling on Objection:
Affidavit of Nhia Thai Vang, June 11, 2021, ¶2	Irrelevant.	Sustained: _____
"I was a Lieutenant in the U.S. Secret War and was involved in intercepting communist supplies being sent down the Ho Chi Minh trail."	Prejudicial, confusing and misleading (FRE 403)	Overruled: _____
¶3	Irrelevant.	Sustained: _____
"I was not injured myself in the war but witnessed others being wounded and killed."	Prejudicial, confusing and misleading (FRE 403)	Overruled: _____
¶4	Irrelevant.	Sustained: _____
"During the war, my wife Bao lived at the Secret Army headquarters base at Long Chieng where she raised our ten children."	Prejudicial, confusing and misleading (FRE 403)	Overruled: _____
¶5	Irrelevant.	Sustained: _____
"When the war ended in 1975 we fled to the jungles of Laos where we lived until 1987."	Prejudicial, confusing and misleading (FRE 403)	Overruled: _____
¶6	Irrelevant.	Sustained: _____
"In 1987 we fled to Thailand where we lived in various refugee camps for two years. On December 7, 1989 we came to the United States."	Prejudicial, confusing and misleading (FRE 403)	Overruled: _____
¶8	Speculation.	Sustained: _____
"We were told if we tried to put in a well the water would be salty so we depended on the water trucks for water."	Hearsay. (FRE 801) Inadmissible opinion. (FRE 701)	Overruled: _____
¶9	Irrelevant.	Sustained: _____
"To get water now we must depend on our daughter and son-in-law to give us water every three days which we transport in two 55 gallon drums."	Prejudicial, confusing and misleading (FRE 403)	Overruled: _____
¶10	Lacks foundation.	Sustained: _____
"As to the attitude of the community, some people are racist towards us and	Irrelevant.	Overruled: _____

1	some people are not.”	Inadmissible opinion. (FRE 701)	
2		Prejudicial, confusing and misleading (FRE 403)	
3	¶12	Speculation.	Sustained: _____
4	“The water issue is a crisis to us and	Lacks foundation.	Overruled: _____
5	we are hurt to the extreme. If my wife	Prejudicial, confusing and	
6	and I are unable	misleading (FRE 403)	
7	to get water, we will have to leave the		
8	property or we will not be able to		
9	survive.”		

Dated: July 29, 2021

SPINELLI, DONALD & NOTT

By: /s/ J. Scott Donald

J. SCOTT DONALD
Attorneys for Defendants